



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

N00158.AR.000246
NAS WILLOW GROVE
5090.3a

February 11, 2007

Mr. Robert F. Lewandowski, P.E.
Navy Base Realignment and Closure
Program Management Office, Northeast
4911 South Broad Street
Philadelphia, Pennsylvania 19112-1303

Subject: Site Management Plan
Naval Air Station Joint Reserve Base
Willow Grove, Pennsylvania
November 2007

Dear Mr. Lewandowski:

In accordance with the Federal Facility Agreement, EPA has reviewed the Site Management Plan and offers the follow comments for you consideration.

1. Document Cover.
Please insert a comma between "Willow Grove" and "Pennsylvania".
2. **3.1.2 Site 2 - Antenna Field Landfill** (p. 3-4)
Last sentence in second paragraph and first sentence in third paragraph say the same thing.
3. **3.1.2 Site 2 - Antenna Field Landfill** (p. 3-5 1st sent.)
Should this say "RI report" or "Phase II RI report"?
4. **3.1.2 Site 2 - Antenna Field Landfill** (p. 3-5 2nd sent.)
Since you mention drum and debris removal in the **last** sentence, please change the sentence to "...discovered debris and discarded empty drums..."
5. **3.1.2 Site 2 - Antenna Field Landfill** (p. 3-5 1st par. last sent.)
Please replace "area between Site 2 and Site 5" to "SSA 12" for consistency. When you discuss SSA 12 in section **3.1.12 Site Screening Area 12**, you identify that SSA 12 is located between Sites 2 and 5 however here it adds no value.

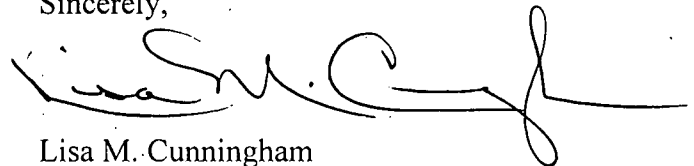


6. **3.1.2 Site 2 - Antenna Field Landfill** (p. 3-5 2nd par. 2nd sent.)
Should this say "draft Phase II RI report"?
7. **3.1.2 Site 2 - Antenna Field Landfill** (p. 3-5 2nd par. 2nd sent.)
Please change to "...that will not include information about SSA 12."
8. **3.1.3 Site 3 - Ninth Street Landfill** (p. 3-6 1st sent.)
Should the word "analyzed" be changed to "examined"? If not, should the sentence read "The integrity of the sediments...?" I'm not clear as to what you are saying.
9. **3.1.3 Site 3 - Ninth Street Landfill** (p. 3-6 2nd par. last sent.)
Should this say "draft Site 3 Phase II RI report"? Report due date does not agree with the due date reflected in Appendix A Document/Milestone Schedule, Site 3 Ninth Street Landfill.
10. **3.1.5 Site 5 - Fire Training Area** (p. 3-7 2nd par. last sentence & 3rd par 2nd sent.)
Remove last sentence in second paragraph and add RI author and year to second sentence of 3rd paragraph.
11. **3.1.8 Site 8 - Building 118-Abandoned Fuel Tank** (p. 3-10 2nd par.)
Please reread the EPA letter of concurrence dated October 4, 2006 and rewrite this sentence.
12. **3.1.9 Site 9 - Steam Plant Building 6 Tank Overfill** (p. 3-11 3rd par.)
Please refer to previous comment.
13. **3.1.10 Site 10 - Navy Fuel Farm** (p. 3-11 2nd sent.)
Should the sentence say "each containing JP-4/JP-5 aviation fuel", "containing JP-4 and JP-5 aviation fuel respectively" or what?

If you would prefer, we can have a meeting to discuss my comments and make the necessary changes to an electronic copy of the document at the meeting. We could also update the Appendix A, MASTER SCHEDULES FOR REMEDIAL RESPONSE ACTIVITIES. The responses could be documented in the minutes of the meeting. Please consider this suggestion in a effort to help expedite the finalization of this document. If you have any questions, please do not hesitate to contact me at (215)814-3363.

Thank you for your consideration of these comments.

Sincerely,



Lisa M. Cunningham
Remedial Project Manager



Copy to:

J. Edmond, NASJRB Willow Grove (electronic only)

C. Frye, FEC Midlant (electronic only)

A. Flipse, PADEP (electronic only)

R. Turner, TtNUS (electronic only)